

**Statement For the Record of Docket 02-98**

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One of the Petitioners calling for mandatory, reserved frequency space for his preferred operating specialty on the 160m band has also filed his support for such a protected operating zone on the proposed 60m band covered in **Docket 02-98**, which presently avoids any segmenting of **5250-5400Kc**, deferring to traditional voluntary and cooperative coordination among radio hobbyists.

William **Tippett**, who runs an email reflector to chat with other ham radio operators involved in the delightful pastime of seeking Morse Code signals of nearly inaudible strength, and about other operating activities such as spectrum-intensive "contesting" on 160m, has concluded there is overwhelming support for full-time, government enforced "sub bands" in our hobbyist radio service.

He states this, despite the opinions of others who discredit existing plans because they fail to allow flexible utilization of spectrum among a broader range of non-emergency modes and activities of equal merit, all of which deserve consideration of being able to use vacant allocations authorized for the Amateur service.

I write for the public record that his conclusion about his statistics is flawed, since it is based on a tilted sample of the amateur population choosing to respond to his efforts at seeking such protection in a request he has made to the federal government.

In this writer's opinion, it is like asking 100 people of one faith if they wish to have protection for their religion. It is inevitable that you will get a strong affirmative answer from a selected, narrow group when prompted to respond, including the type of amen chorus he portrays as part of the numerically "unique" response in his Petition for Rulemaking (**RM-10352**)

I did some website research to make sure of my point, and found a wealth of information to prove there is more than just a response tally involved in drawing, from statistics, any authentic conclusions about a question at hand.

Suffice to say **Tippett** has failed to back his interpretation of the response to **RM-10352**, as submitted as a Reply to Comments in **Docket 02-98**, with any recognized process to validate his view of the simple arithmetic he has presented to you for consideration in both of these regulatory matters. More reliable guidance for the Commission's deliberations in both proceedings is available from the quality, not the quantity, of individual comments filed in your proceedings.

He further ascribes motives to and speculates about why others have filed in opposition to his Petition for Rulemaking, and, by extension, his Comments filed in **Docket 02-98**. He does not, in my view, adequately explain that his analysis is his opinion, and should be regarded as such.

**Tippett** and others who support the retention of operating segregation leftover from the days when Morse Code and Phone held equal popularity are not acknowledging the more important present-day goal of improved spectrum utilization that no longer can afford a rigid, regulatory favoritism of one specialty over all others.

Avoiding preserved operating enclaves for specific groups will encourage a dynamic response of coordination that will improve the use of our frequencies, and that we amateurs are capable of administering among themselves to an extent consistent with a shared-spectrum, hobbyist radio system.

**Statement for the public record.**